

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

NEXTGEAR CAPITAL, INC.,

Plaintiff,

v.

CNG AUTO GROUP, INC. d/b/a TOP
WHEELS; ELONTO R. HERNANDEZ COLON;
and JULISSA M. FUENTES RIVERA,

Defendants.

CIVIL NO. 15-1824

Breach of Contract,
Collection of Monies,
Repossession of Personal Property

**MOTION REQUESTING EXTENSION OF TIME TO
MOVE FOR DEFAULT JUDGMENT AND SUBMIT PROPOSED ORDER**

TO THE HONORABLE COURT:

COMES NOW Plaintiff NextGear Capital, Inc. ("NextGear"), through the undersigned attorneys, and respectfully states and prays as follows:

1. On September 15, 2016, this Honorable Court issued an Order granting NextGear's Motion for Entry of Default and directing NextGear to "move for Default Judgment and file a proposed Default Judgment by 9/22/2016." (Order at Docket No. 42).
2. NextGear hereby requests an extension of fourteen (14) days, up to and including **October 6th**, to comply with the Order at Docket No. 42.
3. This brief extension of time is sought to afford NextGear enough time to calculate the amounts currently owed by Defendants.

WHEREFORE, pursuant to Local Rule 6, NextGear respectfully requests that the Honorable Court grant an extension of time up to and including October 6th, 2016, to move for default judgment and file a corresponding proposed order.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY that today this document was electronically filed with the Clerk of the Court using the CM/ECF system which shall automatically notify the parties' attorneys of record at their e-mail addresses and which, pursuant to Local Civil Rule 5(b)(2), constitutes the equivalent of service.

In San Juan, Puerto Rico, this 21st day of September, 2016.

McConnell Valdés LLC
Attorneys for Plaintiff
NextGear Capital, Inc.
270 Muñoz Rivera Avenue
San Juan, Puerto Rico 00918
P.O. Box 364225
San Juan, PR 00936-4225
Tel.: 787.250.5604
Fax: 787.759.2772
www.mcvpr.com

By: s/ Antonio A. Arias
Antonio A. Arias
USDC-PR No. 204906
aaa@mcvpr.com

By: s/ Sonia M. López del Valle
Sonia M. López del Valle
USDC-PR No. 231413
sld@mcvpr.com